

REMARKS

This application has been carefully reviewed in light of the Office Action dated June 4, 2003 (Paper No. 22). Claims 1 to 60 are currently in the Office Action, with Claims 1, 18, 35 and 52 to 60 being the independent claims. Reconsideration and further examination are respectfully requested.

Claims 1 to 60 were rejected under 35 U.S.C. § 102(a) over Beall, et al., "Inside AutoCAD 14", chapters 16 and 17, July 1997 (Beall). Applicant has considered the Examiner's comments together with the applied reference and respectfully traverses the rejection for at least the following reasons.

Independent Claims 1, 18 and 35 concern the generation of a graphical object comprising a plurality of closed loops. A set of one or more closed first curves are provided, where the set of one or more closed first curves defines a boundary of a surface and contains no self-crossover points. A set of continuous second curves lying on the surface are provided, where each of the continuous second curves intersects and crosses over one or more of the closed first curves but does not intersect other ones of the continuous second curves and where the set of continuous second curves contains no self-crossover points. A set of intersection points is determined, where the intersection points are points where the one or more closed first curves intersect the continuous second curves and which lie on the boundary of the surface. A set of crossover points are then determined from the set of intersection points. A plurality of closed loops are assembled from curve intervals, which are delimited by adjacent crossover points, from the set of one or more closed first curves and the set of continuous second curves in accordance with a

predetermined rule, where the plurality of closed loops abuts a substantial portion of the boundary of the surface. The plurality of closed loops are then filled with a fill to produce the graphical object.

Beall is not understood to disclose the foregoing features of the present invention. In particular, Beall is not understood to disclose at least the features of providing a set of continuous second curves on a surface defined by a set of one or more closed first curves, in which each of the continuous second curves intersects and crosses over one or more of the closed first curves but does not intersect other ones of the continuous second curves and where the set of continuous second curves contains no self-crossover points. Furthermore, Beall is not understood to disclose the features of determining intersection points and crossover points from points where the closed first curves intersect the continuous second curves, and assembling closed loops from curve intervals delimited by adjacent determined crossover points.

The Office Action cited a portion of Beall which concerns the definition of areas in which a hatch pattern is to be placed in a drawing. As described on page 4 of Beall, these areas (hatch boundaries) are defined by either several lines that cross over each other or one or more boundary objects. However, neither the several lines nor the boundary objects mentioned in Beall are understood to correspond with the set of continuous second curves of the present invention. In particular, neither the several lines nor the boundary objects are understood to be provided on a surface defined by a set of one or more closed first curves, in which each of the lines or boundary objects intersects and crosses over one or more of the closed first curves but does not intersect other ones of the

lines or boundary objects and where the set of lines or boundary objects contains no self-crossover points. In fact, as described on page 4 Beall, the “several lines” used to define the hatch boundary are described as crossing over each other and therefore cannot possibly disclose the set of continuous second curves.

Since Beall is not understood to disclose providing a set of continuous second curves, nothing in Beall is understood to disclose determining intersection points and crossover points from points where a set of closed first curves intersect a set of continuous second curves, and assembling closed loops from curve intervals delimited by adjacent determined crossover points.

For the foregoing reasons, Beall is not understood to disclose every element of the claimed invention and therefore is not understood to anticipate the invention set forth in Claims 1, 18 and 35. Accordingly, independent Claims 1, 18 and 35 are believed to be allowable over the applied reference. Reconsideration and withdrawal of the § 102(a) rejection of Claims 1, 18 and 35 are respectfully requested.

Independent Claims 52 to 57, which concern the modification of a font, typeface or character, and independent Claims 58 to 60, which concern the generation of a graphical object, also include the limitation of providing a set of continuous second curves on a surface, where each of the continuous second curves does not intersect other ones of the continuous second curves. As discussed above with respect to independent Claims 1, 18 and 35, Beall is not understood to disclose this feature of the invention.

Furthermore, independent Claims 55 to 57 include the limitations of selecting unmarked adjacent crossover points to form a closed loop and marking the

selected adjacent crossover points. The Office Action appeared to contend that the description in Beall concerning islands within hatch areas (pages 5 and 6) and an explode command (page 8) disclose these features of the invention. However, nothing in these portions of Beall is understood to disclose these claimed limitations and the Office Action did not clearly set forth which portions of Beall disclose the limitations of selecting unmarked adjacent crossover points to form a closed loop and marking the selected adjacent crossover points.

Accordingly, independent Claims 52 to 60 are also believed to be allowable over the applied reference. Reconsideration and withdrawal of the § 102(a) rejection of Claims 52 to 60 are respectfully requested.

The other claims in the application are dependent from independent Claims 1, 18 and 35 discussed above and therefore are believed to be allowable over the applied reference for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing remarks, the entire application is believed to be in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's undersigned attorney may be reached in our Costa Mesa,
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Respectfully submitted,



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